

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF
MICHIGAN SOUTHERN DIVISION

In Re: Joseph DuMouchelle Fine
& Estate Jewellers, L.L.C

Case No. 19-56239-pjs
Hon. Phillip J. Shefferly
Chapter 11

Debtor.

**MOTION TO WITHDRAW
AS COUNSEL FOR
JOSEPH G. DUMOUCHELLE, AND MELINDA ADDUCCI**

Robert Bassel, Movant, states as follows:

1. The Michigan Rules of Professional Conduct, Rule 1.16 provide in pertinent part as follows:
 - (a) Except as stated in paragraph (c), a lawyer shall not represent a client or, where representation has commenced, shall withdraw from the representation of a client if:

... (3) the lawyer is discharged.
 - (b) Except as stated in paragraph (c), after informing the client that the lawyer cannot do so without permission from the tribunal for the pending case, a lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client, or if:
...(3) the client insists upon pursuing an objective that the lawyer considers repugnant or imprudent;
(4) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;... or (6) other good cause for withdrawal exists.
2. Joseph DuMouchelle and Melinda Adducci retained Movant to represent them.
3. Movant is in the process of filing motions to withdraw from all

representations of Mr. DuMouchelle and Ms. Adducci, in the following cases and proceedings (the “Cases”):

Case Name: Joseph G. DuMouchelle and Melinda J. Adducci

Case Number: 19-54531-pjs

Case Name: Harrity v. DuMouchelle et al

Case Number: 20-04160-pjs

Case Name: Gelov v. DuMouchelle et al

Case Number: 20-04172-pjs

Case Name: Joseph DuMouchelle Fine & Estate Jewellers, L.L.C

Case Number: 19-56239-pjs

4. Due to, inter alia, being terminated and a breakdown in the attorney-client relationship, Movant is no longer able to represent Mr. DuMouchelle and Ms. Adducci. Good cause exists in this case to allow Movant to withdraw as counsel for them.

WHEREFORE, Movant moves this Court for entry of an Order allowing it to withdraw as counsel for Joseph G. DuMouchelle, a/k/a Joe G. DuMouchelle, and Melinda Adducci, a/k/a Lindy J. Adducci, and granting such other relief this Court deems just and appropriate.

Respectfully submitted,

_____/s/ Robert Bassel _____

ROBERT N. BASSEL (P48420)

Attorneys for Movant

P.O. Box T

Clinton, MI 49236

(248) 677-1234

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DATED: 6/1/2020

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**ORDER OF WITHDRAWAL OF ROBERT BASSEL AS
ATTORNEY OF RECORD FOR JOSEPH G. DUMOUCHELLE,
AND MELINDA ADDUCCI**

THIS MATTER came before the Court on the Motion of Robert Bassel to withdraw as counsel for Joseph G. Dumouchelle, and Melinda Adducci. The Court finds that sufficient cause exists for the relief requested and that there are no unresolved objections. Accordingly,

IT IS ORDERED that Robert Bassel. is withdrawn as the attorney of record for Joseph G. DuMouchelle, a/k/a Joe G. DuMouchelle, and Melinda Adducci, a/k/a Lindy J. Adducci.

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NOTICE OF OPPORTUNITY TO RESPOND TO MOTION TO WITHDRAW

PLEASE TAKE NOTICE that Robert Bassel has filed a motion to withdraw as counsel for Joseph DuMouchelle and Melinda Adducci for the reasons set forth in his motion.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

The Motion is available for review at the office of the Clerk of the U.S. Bankruptcy Court for the Eastern District of Michigan, located at 211 W. Fort Street, 17th Floor, Detroit, Michigan, or may be obtained by sending a **written** request to undersigned counsel at the address below.

If you do not want the Court to grant the relief sought in the motion, or if you want the Court to consider your views on the motion, within 14 days unless shortened by the Court, you or your attorney must:

1. Communicate with the Court regarding your response or an answer explaining your position, at: United States Bankruptcy Court, 211 W. Fort Street, 17th Floor, Detroit, Michigan You must also communicate your response to undersigned counsel at the address stated below.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief requested in the motion.

Respectfully submitted,
/s/ Robert Bassel
Robert N. Bassel (P48420)
Attorneys for Movant
P.O. Box T
Clinton, MI 49236
248-677-1234
bbassel@gmail.com
Dated: 6.2.2020

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PROOF OF SERVICE

The undersigned served, or caused to be served, copies of MOTION TO WITHDRAW, Notice of Time to Respond and Proof of Service upon the following by U.S. Mail or via the ECF system which is designed to serve notice upon the following, where applicable:

matrix

Respectfully submitted,

/s/ Robert Bassel

Robert N. Bassel (P48420)

Attorneys for Movant

P.O. Box T

Clinton, MI 49236

248-677-1234

bbassel@gmail.com

Dated: 6.2.2020